

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**CASSIE GREEN a.k.a.
CASSIE HAYES-MCDONALD**

Plaintiff,

v.

**EQUIFAX INFORMATION SERVICES,
LLC, AMERICOLLECT, INC.,
PENNSYLVANIA HIGHER EDUCATION
ASSISTANCE AGENCY PARENTS'
ASSOCIATION, INC., FIRST PREMIER
BANK, BARCLAYS BANK DELAWARE,
ALLY FINANCIAL, INC., and
COMENITY, LLC,**

Defendants.

**Civil Action No.
4:20-cv-01096-SRC**

**PLAINTIFF'S RESPONSE TO DEFENDANT COMENITY, LLC'S MOTION TO
COMPEL ARBITRATION AND TO DISMISS**

NOW COMES the Plaintiff, CASSIE GREEN, by and through her counsel, and responds to Defendant Comenity, LLC's ("Comenity") Motion to Compel Arbitration and to Dismiss Plaintiff's claims as follows:

1. Admit
2. Denied.
3. Denied.
4. Admits lawsuit was filed but denies Plaintiff agreed to the arbitration agreement.
5. Denied.
6. No answer required.

WHEREFORE, Plaintiff requests that this Court deny Comernity's Motion to Compel Arbitration and to Dismiss, relying on her Suggestions in Support, filed contemporaneously with this response.

Respectfully submitted,

DATED: October 26, 2020

By: /s/Richard M. Maseles
Richard M. Maseles
ED MO Bar # 58243MO
110 Crestmere Ave.
Columbia, MO 65203
richard@richardmaseles.com
Attorneys for Plaintiff,
Cassie Green a.k.a.
Cassie Hayes- McDonald

Certificate of Service

On October 26, 2020, I served a copy of the foregoing document upon all parties and counsel as their addresses appear of record via the Court's CM/ECF system.

/s/ Richard M. Maseles